EXHIBIT 22

Reed Complaint filed in state court in Davidson County, Tennessee (excerpt)

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D.C.

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

WAYNE A. REED, individually and as husband and next of kin of decedent, DIANA E. REED,	)
Plaintiff,	)
v.	)
SAINT THOMAS OUTPATIENT NEUROSURGICAL CENTER, LLC, HOWELL ALLEN CLINIC a Professional Corporation, SAINT THOMAS NETWORK, SAINT THOMAS HEALTH, and ST. THOMAS HOSPITAL	)
Defendants.	)

Case No. 13C-417
Jury Demand

COMPLAINT

Plaintiff, WAYNE A. REED, individually as husband and as next of kin of his deceased wife, DIANA E. REED, respectfully states as follows for his causes of action against the Defendants:

INTRODUCTION AND SUMMARY OF CLAIMS

1. This case arises from the wrongful conduct of corporate defendants who sold dangerous products to innocent patients. Those companies recklessly disregarded patient safety by purchasing and selling injectable steroids that they knew or should have known were dangerous. The Defendants acted in concert to operate a for-profit pain clinic known as Saint Thomas Outpatient Neurosurgical Center. That pain clinic disregarded alarming and important information when it selected New England Compounding Pharmacy, Inc., d/b/a New England Compounding Center ("NECC") as its supplier of injectable steroids. Long before the present fungal meningitis outbreak, the medical and regulatory communities published substantial information about the dangers of pharmacy compounding in general and NECC in particular. In

FACTS

24. Plaintiff's deceased wife, Diana Reed, received three cervical epidural steroid injections during August and September 2012 at Saint Thomas Neurosurgical. Dr. John Culclasure, medical director of Saint Thomas Neurosurgical, administered those cervical epidural steroid injections.

25. The steroid injected into Mrs. Reed's cervical spine was methylprednisolone acetate ("MPA") manufactured by NECC.

NECC History

26. NECC began operations in June 1998. The first government enforcement action against NECC began in April 1999, just 10 months after it obtained its license. The Massachusetts Board of Registration in Pharmacy (the "MA Board") filed a complaint asserting that NECC was including blank prescriptions in its solicitations to doctors, in violation of state law.

27. In 2002, a doctor reported to the United States Food and Drug Administration ("FDA") that as many as five patients became ill following epidural injections that contained NECC medications.

28. In July 2002, a patient in New York contracted bacterial meningitis and later died after being injected with contaminated MPA compounded by NECC. In 2004, the patient's family sued the NECC and the medical providers who performed the injection.

29. In August 2002, additional adverse events were reported to the FDA concerning patients who contracted meningitis. The suspected source of the infections was epidural injections that contained methylprednisolone acetate compounded by NECC. The FDA investigated NECC following those adverse events and found that five of 16 vials were